

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

DR. JOHN ROE, PH.D.)
Plaintiff,)
vs.) Case No.: 5:22-CV-00869-JKP-HJB
UNITED STATES OF AMERICA, et. al.,)
Defendant(s))

**PLAINTIFF'S MOTION TO COMPEL ACCESS TO THE CLASSIFIED INFORMATION
IN PLAINTIFF'S MIND
(HEARING REQUESTED)**

Plaintiff, Dr. John Roe, Ph.D., by and through counsel, moves this Court for an order compelling that Plaintiff and counsel be permitted to access the classified contents of Plaintiff's mind as well as any classified discovery¹ necessary for the adjudication of his claims. To the extent necessary, inclusive to this Motion is that Plaintiff's counsel be granted any clearance renewals and/or "read-ins" necessary to effectuate the access to classified information. A memorandum in support of this Motion and Proposed Order containing the specific relief requested by Plaintiff are attached.

[INTENTIONALLY LEFT BLANK]

¹ See Plaintiff's Motion to Compel Discovery filed contemporaneously with this and a motion to adopt CIPA-like procedures in this case.

Respectfully submitted,

/s/ John W. Hodges, Jr.

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on April 28, 2023, I filed the foregoing *Motion* and served the same on all counsel of record via the same.

/s/ Jason R. Wareham

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